

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

BUREAU OF AIR

DIVISION of AIR POLLUTION CONTROL

PERMIT SECTION

PROJECT SUMMARY for the
DRAFT TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

BWAY Packaging
3400 North Powell Avenue Franklin Park, Illinois 60131

Permit Engineer/Technical Contact: Anatoly Belogorsky, 217/782-2113

Community Relations/Comments Contact: Brad Frost, 217/782-7027

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Springfield, Illinois

I. INTRODUCTION

This source has applied for a renewal of the Title V - Clean Air Act Permit Program (CAAPP) operating permit (I.D. 031096AAE, Permit # 95120005) for its existing operation. The CAAPP is the program established in Illinois for operating permits for significant stationary sources as required by the federal Clean Air Act, as amended in 1990, and 40 CFR Part 70. Unlike state operating permits, the conditions in a CAAPP permit are enforceable by both the Illinois Environmental Protection Agency (Illinois EPA) and the USEPA. This document is for informational purposes only and does not shield the Permittee from enforcement actions or its responsibility to comply with applicable regulations. This document shall not constitute a defense to a violation of the Act or any rule or regulation.

A Title V permit contains conditions listing the applicable state and federal air pollution control regulations that apply to a source. The permit conditions also establish emission limits, appropriate compliance procedures, and specific operational flexibility. The appropriate compliance procedures may include monitoring, record keeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis to demonstrate that the source is operating in accordance with the requirements of the permit.

II. KEY ELEMENTS OF THE PROPOSED PERMIT

This Title V permit is divided into several sections and the following are the important segments that maybe of interest to the general public:

- a. Source identification
- b. List of abbreviations and acronyms commonly used
- c. Insignificant activities
- d. Significant emission units operated at the source (Section 4)
- e. Overall source conditions (Section 5)
- f. Conditions for emissions trading programs (Section 6)
- g. Conditions for specific significant emission units (Section 7)
- h. General permit conditions (Section 8)
- i. Standard permit conditions (Section 9)
- j. Attachments (Section 10)

III. SOURCE DESCRIPTION INFORMATION

a. Location and nature of business

BWAY Packaging is located at 3400 North Powell Avenue in Franklin Park and consists of four tinplate sheet fed coater oven lines and two tinplate heatset sheet fed offset lithographic printing lines with overvarnish coaters. Four thermal oxidizers are employed to control VOM emissions from permanent total enclosures and ovens. The tinplate sheets are coated with an organic coating, printed and varnished as required and subsequently cut into rectangular blanks for use in making cans.

b. National Ambient Air Quality Standard status for this area

This source is located in an area that is non-attainment for ozone and PM_{2.5} and attainment for other pollutants of the National Ambient Air Quality Standards.

c. Major source status

This permit is issued based on the source requiring a CAAPP permit as a major source of VOM emissions.

d. Significant emission units

Emission Unit	Description	Date of Construction	Emission Control Equipment
Unit 01 Heatset Sheet Fed Offset Lithographic Printing Lines	Lines PC-2, PC-5, PC-7, PC-8	PC-2: 1975 PC-5: 1995 PC-7: 2003 PC-8: 2004	Smith Thermal Oxidizer for Controlling Drying Ovens and VOM Emissions from Applied Inks Catpro Thermal Oxidizer None
Unit 02 Coating Application	Four Coating Lines and Three Coating/Varnish Applicators (operated as a part of Printing Lines)	CO-1: prior to 1972 CO-3: 1997 CO-4: prior to 1972 CO-6: 2003 CTO-4 (part of PC-7): 2003 Two Coaters (Part of PC- 2/PC-7): 1975; 1995	Permanent Total Enclosures with four Thermal Oxidizers
Unit 03 Space Heater	One Natural Gas-Fired Space Heater with a Firing Rate 25.0 MBtu/hr	1987	None

IV. EMISSIONS INFORMATION

The proposed permit limits the source wide maximum annual emissions from significant emission units at the source. Insignificant activities at this source are not accounted for in the source-wide limit. Further unit specific emission unit limitations are found within Sections 5 and 7 of the proposed permit.

For purposes of fees, the source is allowed the following emissions:

Pollutant	Tons/Year
Volatile Organic Material (VOM)	51.73
Sulfur Dioxide (SO ₂)	----
Particulate Matter (PM)	0.37
Nitrogen Oxides (NO _x)	4.57
HAP, not included in VOM or PM	----
Total	56.67

This proposed permit contains terms and conditions that address the applicability, and, if determined applicable, substantive requirements of Title I of the Clean Air Act (CAA) and regulations promulgated thereunder, including 40 CFR 52.21, Prevention of Significant Deterioration (PSD) and 35 IAC Part 203, Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within the proposed permit by T1, T1R, or T1N. Any conditions established in a construction permit [T1] pursuant to Title I and not revised or deleted in this proposed permit, remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them. Where the source has requested that the Illinois EPA establish new [T1N] or revise [T1R] such conditions in a Title I permit, those conditions are consistent with the information provided in the Title V application and will remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them.

This proposed permit does not establish any new [T1N] requirements or revised [T1R] requirements.

V. EMISSIONS CONTROL PROGRAMS INFORMATION

Emissions Reduction Market System (ERMS)

Because this source is located in the Chicago ozone non-attainment area and emits volatile organic material (VOM), the proposed permit includes conditions to implement the Emissions Reduction Market System (ERMS). The ERMS is a market-based program designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as further described in Section 6.0 of the proposed permit. The proposed permit contains the Illinois EPA's determination of the source's baseline emissions and allotment of trading units under the ERMS, and identifies units not subject to further reductions.

VI. MONITORING and COMPLIANCE ASSURANCE MONITORING (CAM) PLAN INFORMATION

- a. The Compliance Assurance Monitoring (CAM) plan is a program for pollutant-specific emission units which use an add-on control device to achieve compliance with an emission limitation or standard, has potential pre-control device emissions of the

applicable regulated air pollutant that are equal to or greater than major source threshold levels, and is not specifically exempt by 40 CFR Part 64. Subject units and the CAM plans are identified in Attachment 3 of the proposed permit.

- b. The following emission units (or group of emission units) at the source utilize instrumental or non-instrumental monitoring procedures for verifying compliance with existing emission standards and/or limitations:

Emission Unit (Group of emission units)	Instrumental Monitoring Procedures (values and parameters measured)	Non-instrumental Monitoring Procedures (testing, recordkeeping, inspections, operational practices, etc.)	CAM Applicability Yes/No (based on the information provided in the CAAPP)
Coating Application	A temperature monitoring devices are used to control the temperature in the thermal oxidizers to ensure operation at the maximum destruction efficiency.	Testing and recordkeeping of the VOM content in applied coatings	Yes
Heatset Sheet Fed Offset Lithographic Printing Lines	<p>A temperature monitoring devices are used to control the temperature in the thermal oxidizers to ensure operation at the maximum destruction efficiency.</p> <p>Determination the VOM content of the as-applied fountain solution based on the setting of the automatic feed equipment which makes additions of VOM up to a pre-set level.</p>	Testing and recordkeeping of inks, coatings, and other VOM applied materials	Yes
Space Heater	None	Recordkeeping of the natural gas usage	No

VII. OTHER PERTINENT INFORMATION

a. Fugitive Particulate Matter Operating Program

The fugitive operating program is intended to significantly reduce fugitive particulate matter emissions within certain affected locations and facilities in Illinois. The source is subject to the fugitive operating program for particulate matter. Normally, affected operations by this program include, but are not limited to, addressing normal traffic pattern roads, parking facilities, and material piles and handling. Usually a source addresses the programs through the use of water, oils, or chemical dust suppressants.

b. Risk Management Plan (RMP)

A risk management plan (RMP) is a program required for a source affected by Chemical Accident Prevention for reducing the levels of emissions during an emergency, consistent with safe operating procedures. If the Permittee becomes subject to the RMP then the Permittee would be required to immediately implement the appropriate steps described in this plan should an emergency be declared. The Permittee then would be required to maintain and have this plan on file with the Illinois EPA.

c. Episode Action Plan (EAP)

An episode action plan (EAP) is a program for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The Permittee is required to immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared. The Permittee is required to maintain and have this plan on file with the Illinois EPA.

VIII. COMPLIANCE INFORMATION

The source has certified compliance with all applicable rules and regulations; therefore, a compliance schedule is not required for this source.

IX. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this source's permit application meets the standards for issuance of a Title V permit. The Illinois EPA is therefore proposing to issue a Title V permit, subject to the conditions proposed in the draft permit.

Comments are requested by the Illinois EPA for the proposed permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 166.